

DMB:SA
F.#2011R01313

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

CR 12 - 134

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UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

IBRAHIM SULEIMAN ADNAN ADAM HARUN,
also known as "Spin Ghul,"
"Esbin Gol," "Isbungoul,"
"Abu Tamim," "Joseph Johnson"
and "Mortala Mohamed Adam,"

Defendant.

Cr. No. 12-134
(T. 18, U.S.C., §§
844(h)(1), 844(h)(2),
924(c)(1)(A)(i),
924(c)(1)(A)(iii),
924(c)(1)(B)(ii),
2332(b)(2), 2332f(a)(2),
2332f(b)(2), 2332f(c),
2339B(a)(1), 2339B(d), 2
and 3551 § 8)

KORMAN, J.

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THE GRAND JURY CHARGES:

GO, M.J.

COUNT ONE

(Conspiracy to Murder United States Nationals)

1. In or about and between August 2001 and September 2011, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendant IBRAHIM SULEIMAN ADNAN ADAM HARUN, also known as "Spin Ghul," "Esbin Gol," "Isbungoul," "Abu Tamim," "Joseph Johnson" and "Mortala Mohamed Adam," together with others, while outside the United States, did knowingly, intentionally and with malice aforethought conspire to kill one or more nationals of the United States, which killings would have constituted murder as defined in Title 18, United States Code, Section 1111(a).

2. In furtherance of the conspiracy and to effect its objects, the defendant IBRAHIM SULEIMAN ADNAN ADAM HARUN,

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together with others, committed and caused to be committed, among others, the following:

OVERT ACTS

a. In or about and between 2002 and 2003, both dates being approximate and inclusive, the defendant IBRAHIM SULEIMAN ADNAN ADAM HARUN, together with others, attempted to kill United States military personnel in Afghanistan.

b. In or about August 2003, the defendant IBRAHIM SULEIMAN ADNAN ADAM HARUN traveled from Pakistan to Nigeria.

c. In or about and between August 2003 and January 2005, both dates being approximate and inclusive, the defendant IBRAHIM SULEIMAN ADNAN ADAM HARUN traveled within Nigeria and other African countries.

(Title 18, United States Code, Sections 2332(b)(2) and 3551 et seq.)

COUNT TWO

(Conspiracy to Bomb a Government Facility)

3. In or about and between August 2003 and January 2005, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendant IBRAHIM SULEIMAN ADNAN ADAM HARUN, also known as "Spin Ghul," "Esbin Gol," "Isbungoul," "Abu Tamim," "Joseph Johnson" and "Mortala Mohamed Adam," together with others, did knowingly and intentionally conspire to unlawfully deliver, place, discharge

and detonate one or more explosives and other lethal devices in, into and against one or more government facilities, to wit: United States diplomatic and consular facilities in Nigeria, with the intent to cause death, serious bodily injury and extensive destruction of such facilities, where such destruction was likely to result in major economic loss, contrary to Title 18, United States Code, Section 2332f(a)(1).

(Title 18, United States Code, Sections 2332f(a)(2), 2332f(b)(2), 2332f(c) and 3551 et seq.)

COUNT THREE

(Conspiracy to Provide Material Support
to a Foreign Terrorist Organization)

4. In or about and between August 2001 and September 2011, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendant IBRAHIM SULEIMAN ADNAN ADAM HARUN, also known as "Spin Ghul," "Esbin Gol," "Isbungoul," "Abu Tamim," "Joseph Johnson" and "Mortala Mohamed Adam," together with others, did knowingly and intentionally conspire to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including false documentation and identification, lethal substances, explosives and personnel, including himself, to a foreign terrorist organization, to wit: al-Qaeda.

(Title 18, United States Code, Sections 2339B(a)(1), 2339B(d) and 3551 et seq.)

COUNT FOUR

(Provision and Attempted Provision of Material Support to a Foreign Terrorist Organization)

5. In or about and between August 2001 and January 2005, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendant IBRAHIM SULEIMAN ADNAN ADAM HARUN, also known as "Spin Ghul," "Esbin Gol," "Isbungoul," "Abu Tamim," "Joseph Johnson" and "Mortala Mohamed Adam," together with others, did knowingly and intentionally provide and attempt to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including false documentation and identification, lethal substances, explosives and personnel, including himself, to a foreign terrorist organization, to wit: al-Qaeda.

(Title 18, United States Code, Sections 2339B(a)(1), 2339B(d), 2 and 3551 et seq.)

COUNT FIVE

(Use of Firearms)

6. In or about and between August 2001 and September 2011, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendant IBRAHIM SULEIMAN ADNAN ADAM HARUN, also known as "Spin Ghul," "Esbin Gol," "Isbungoul," "Abu Tamim," "Joseph Johnson" and "Mortala Mohamed Adam," together with others, did knowingly and intentionally use and carry one or more firearms during and in relation to one or more crimes of violence, to wit: the crimes

charged in Counts One and Three, and did knowingly and intentionally possess such firearms in furtherance of said crimes of violence, one or more of which firearms was discharged, one or more of which firearms was a machinegun, and one or more of which firearms was a destructive device.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(iii), 924(c)(1)(B)(ii), 2 and 3551 et seq.)

COUNT SIX
(Use of Explosives)

7. In or about and between August 2001 and September 2011, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendant IBRAHIM SULEIMAN ADNAN ADAM HARUN, also known as "Spin Ghul," "Esbin Gol," "Isbungoul," "Abu Tamim," "Joseph Johnson" and "Mortala Mohamed Adam," together with others, did knowingly and intentionally use one or more explosives, to wit: gunpowder, explosive bombs, grenades, missiles and other similar devices, to commit one or more felonies, to wit: the crimes charged in Counts

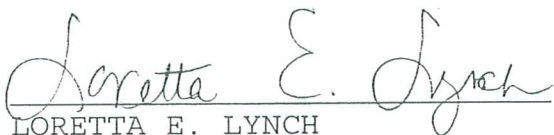
One, Three and Four, and did knowingly and intentionally carry such explosives during the commission of said felonies.

(Title 18, United States Code, Sections 844(h)(1), 844(h)(2), 2 and 3551 et seq.)

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LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK